

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

In re: ) Chapter 11  
)  
EBRO Real Estate Holdings, LLC ) Judge Eugene R. Wedoff  
)  
)  
Debtor and Debtor in Possession. ) Case No. 09-10104  
)  
) Hearing: 9/30/2009 at 10:00am

**NOTICE OF MOTION**

To: See attached service list

PLEASE TAKE NOTICE that on **September 30, 2009 at 10:00am**, I shall appear before the Honorable Eugene R. Wedoff, or any other Judge sitting in his stead, in Courtroom 744, Dirksen Federal Building, 219 S. Dearborn St., Chicago, IL, and shall then and there present the **Application to Employ Accountant for Debtor**, a copy of which is enclosed and is herewith served upon you. At which time and place you may appear and be heard.

/s/ Forrest L. Ingram  
One of Debtor's attorneys

Forrest L. Ingram  
Forrest L. Ingram, P.C.  
79 W. Monroe St., Suite 900  
Chicago, IL 60603  
(312) 759-2838

**CERTIFICATE OF SERVICE**

I, Philip Groben, a non-attorney, certify that I caused a true and correct copy of the above and foregoing notice and the document to which it refers to be served upon the parties listed on the attached service list, via electronic delivery, U.S. Mail and facsimile, as indicated on the list, on September 25, 2009.

/s/ Philip Groben

**SERVICE LIST**

**Via ECF:**

*U.S. Trustee*  
William T. Neary  
Office of the U.S. Trustee, Region 11  
219 S. Dearborn Street  
Room 873  
Chicago, IL 60604  
(312)886-5785

**Via U.S. Mail:**

*Debtor*  
EBRO Real Estate Holdings, LLC  
1330 West 43rd St.  
Chicago, IL 60609

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Debtor and Debtor in Possession.	)	Case No. 09-10104
	)	
	)	Hearing: 9/30/2009 at 10:00am.

**APPLICATION TO EMPLOY ACCOUNTANT FOR DEBTOR**

NOW COMES the Debtor and Debtor in Possession EBRO Real Estate Holdings, LLC (the “Debtor”), by and through its attorneys at FORREST L. INGRAM, P.C., and, pursuant to 11 U.S.C. §327(a), applies to this Honorable Court for authority to employ Clifton Gunderson LLP (“Clifton Gunderson”) as its accountant to assist the Debtor in preparing and filing financial reports and tax documents in this chapter 11 case, for these reasons:

1. On March 24, 2009, the Debtor filed a voluntary petition under chapter 11, title 11, United States Code.
2. The Debtor remains in possession of its assets and conducts its business pursuant to 11 U.S.C. §§ 1107 and 1108.
3. Clifton Gunderson was Debtor’s accountant prior to Debtor filing its chapter 11 petition and is familiar with Debtor’s business, accounts, and financial reporting requirements of the Debtor.
4. It is in the best interest of the Debtor’s estate and its creditors that the Debtor be authorized to employ Clifton Gunderson to provide accounting services to the Debtor in these proceedings.
5. Clifton Gunderson will render professional services, as follows:

- Prepare and file federal income tax return, Form 1065
- Prepare and file state income tax return, Illinois Form IL-1065
- Prepare monthly operating reports, liquidation analysis, and projection of plan payments.

6. The Debtor desires to employ Clifton Gunderson as its accountant in this Chapter 11 case on an hourly basis; work done by administrative personnel will range from \$85-\$110 per hour, work done by Entrepreneurial Business Services Department Personnel will range from \$112 - \$210 per hour, and work done by firm partners will cost \$300 per hour. Clifton Gunderson will keep a record of the time spent on such services to the tenth of an hour.

7. To the best of Debtor's knowledge Clifton Gunderson has no ongoing material connection with the Debtor, its creditors or any other parties in interest or their respective attorneys or other accountants that would conflict with their duties as accountant for the Debtor in this case. (See Affidavit of Disinterestedness attached hereto as **Exhibit A**).

**WHEREFORE**, the Debtor prays that it be authorized, pursuant to 11 U.S.C. §327(a), to employ Clifton Gunderson to provide accounting services to the Debtor in these proceedings, and asks for such other and further relief as this Court deems just.

Respectfully submitted,

EBRO Real Estate Holdings, LLC

By: /s/ Forrest Ingram  
One of Debtor's attorneys

Forrest L. Ingram #3120932  
Peter L. Berk  
Forrest L. Ingram, P.C.  
79 W. Monroe St., Suite 900  
Chicago, IL 60603

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**ORDER ALLOWING EMPLOYMENT OF ACCOUNTANT**

This matter came to be heard on the application of Debtor, EBRO REAL ESTATE HOLDINGS, LLC, for authority to employ Clifton Gunderson LLP as its accountant. Due notice having been given and that the Court being fully advised in these premises,

**IT IS HEREBY ORDERED**

Debtor is authorized, pursuant to 11 U.S.C. §327(a), to employ Clifton Gunderson LLP as its accountant:

Debtor will submit time sheets with periodic applications to pay Clifton Gunderson LLP for its services, and, upon approval of the fees by the court, will compensate Clifton Gunderson LLP on an hourly basis, ranging from \$85 to \$300, depending upon who is performing services for the debtor.

This order is effective retroactive to March 24, 2009

Dated:

BY THE COURT:

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Honorable Eugene R. Wedoff  
U.S. Bankruptcy Judge

This document was prepared by  
Forrest L. Ingram, P.C.